



1150156 - R8 SDMS

September 22, 2008

Sent via email

Eric Johnson  
U.S. Environmental Protection Agency  
Region 8, 8ENF-T  
999 18<sup>th</sup> Street, Suite 300  
Denver, Colorado 80202-2466

RE: Progress report for August 2008 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Mr. Johnson:

Per paragraph 64 of the Order, enclosed is a copy of the August 2008 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at [pglader@hecla-mining.com](mailto:pglader@hecla-mining.com).

Sincerely,

A handwritten signature in black ink, appearing to read "P. Glader", with a long horizontal line extending to the right.

Paul L. Glader  
Manager Environmental Services

Encl

Cc: HMC Legal Dept (w/o attachments)  
John Jacus, Esq. (DG&S)



September 22, 2008

Sent via U.S. Mail

Glenn Rogers, Chairman.  
Shivwits Band of Palute Indian Tribe  
6060 West 3650 North  
Ivins, Utah 84738

John Krause  
Bureau of Indian Affairs  
400 North 5<sup>th</sup> Street, Floor 12  
Phoenix, AZ 85004

Kelly Youngbear  
BIA Southern Palute Agency  
P.O. Box 720  
St. George, UT 84771

RE: Progress report for August 2008 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Chairman Rogers, Mr. Krause and Ms. Youngbear:

Per paragraph 64 of the Order, enclosed is a copy of the August 2008 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at [pglader@hecla-mining.com](mailto:pglader@hecla-mining.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Paul L. Glader", with a long, sweeping horizontal line extending to the right.

Paul L. Glader  
Manager Environmental Services

Encl

Cc: HMC Legal Dept. (w/o attachments)  
John Jacus, Esq. (DG&S) (w/o attachments)  
Eric Johnson (USEPA, Region VIII) (w/o attachments)

# **Annual Site Inspection Summary Sheet - Apex Site - Pond 2**

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

## **Form 1 of 4 - Summary**

Date: <u>8-16-08</u>			
Inspector: <u>Thuman</u>			
Cover System Component	Potential Problem		Limits Potentially Exceeded
Site Perimeter	Erosion or Fencing Issues		NA
Cover System (outslopes, top, rock)	Subsidence		Minor: ponding < 1" some gullying / erosion Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
			Significant: see Table 2 Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Embankment Slope Stability		excessive movement or surface cracks > than 1" Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Gullying	on top	depth > 1" Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		at embankment crest or on outslope	depth > 2" Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		w/in normal flow channel in diversion channel	no gullying allowed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		w/in diversions at toe of impoundment outslope	no gullying allowed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		in diversion channel at any other location	NA NA
	Erosion Protection Stability		rock subsiding or missing Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Seepage		no colored seepage allowed (red, blue, yellow w/ crystallization) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Runoff Control System	Diversion Channel		rock in place, channel not moving, fence stable Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	Diversion Swales		rock in place, no silting in or head cutting Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	Excessive silt build up at fence lines in diversion channel		allowed if not effecting cover system Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

\* Mark all areas of concern or requiring repairs on attached site map.

Annual Site Inspection - Apex Site - Pond 2

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

**Form 2 of 4 - Site Perimeter**

Inspection Date: <u>8-16-10</u>	
Inspector: <u>J. R. Mearns</u>	
<b>Visible Outlying Areas</b>	
Observed Condition:	<u>All areas looked good.</u>
Observed Damage:	<u>None</u>
May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Property Boundary Fence and Gate (walk fence line)</b>	
Observed Condition:	<u>All looks good</u>
Observed Damage:	<u>None</u>
Potential Corrective Actions:	<u>None</u>
May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>All Upgradient Areas (areas that drain onto property)</b>	
Observed Condition:	<u>Looks good.</u>
Observed Damage:	<u>None</u>
May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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Annual Site Inspection - Apex Site - Pond 2

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

**Form 3 of 4 - Impoundment**

Inspection Date: <u>8-16-08</u> Inspector: <u>T. Benson</u>			
<b>Outslopes</b>			
Observed Performance:	Rock Cover Subsidence:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Excessive Slope Movement (failure):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Gully Development:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Observable Leachate (colored):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Excessive Siltation (at slope toe):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Observed Damage: <u>NONE</u>			
Potential Corrective Actions: <u>NONE</u>			
<b>Top (top surface soils)</b>			
Observed Performance:	Cracking (>1" width):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Settlement / Evidence of Ponding:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Erosion / Gullyng:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Observed Damage: <u>NONE</u>			
Potential Corrective Actions: <u>NONE</u>			
<b>Erosion Protection Layer (rock)</b>			
Observed Performance:	Rock Staying in Place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Rock Subsiding:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Missing Rock:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Observed Damage: <u>NONE</u>			
Potential Corrective Actions: <u>NONE</u>			

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

**Hecia Mining Company - Long-Term Maintenance and Monitoring Plan**

**Form 4 of 4 - Diversion Channel and Swales**

Date: <u>8-16-08</u>			
Inspector: <u>Travis</u>			
<b>Diversion Channel</b>			
Observed Performance:	Erosion Protection in place:	Yes <u>✓</u> No <u>   </u>	May require repair: Yes <u>   </u> * No <u>✓</u>
	Normal Flow Channel in place:	Yes <u>✓</u> No <u>   </u>	May require repair: Yes <u>   </u> * No <u>✓</u>
	Encroaching on Site Fencing:	Yes <u>   </u> No <u>✓</u>	May require repair: Yes <u>   </u> * No <u>✓</u>
Observed Damage: <u>None</u>			
Potential Corrective Actions: <u>None</u>			
<b>Diversion Swales</b>			
Observed Performance:	Erosion Protection in place:	Yes <u>✓</u> No <u>   </u>	May require repair: Yes <u>   </u> * No <u>✓</u>
	Flow Channel Silting In:	Yes <u>   </u> No <u>✓</u>	May require repair: Yes <u>   </u> * No <u>✓</u>
	Head Cutting:	Yes <u>   </u> No <u>✓</u>	May require repair: Yes <u>   </u> * No <u>✓</u>
Observed Damage: <u>None</u>			
Potential Corrective Actions: <u>None</u>			

\* Mark all areas of concern or requiring repairs on attached site map.



# ALPHA ENGINEERING COMPANY

148 East Tabernacle, St. George, UT 84770 • (435) 628-6500 • Fax: (435) 628-6553

**HECLA MINING SITE  
MONUMENT MONITORING  
(AS-BUILD DATE: JULY 8, 2008)**

Monument #	Northing	Easting	Elevation	Remarks
#1	10121.38	10130.69	3685.60	Top alum. cap
#2	10146.00	10277.48	3685.73	Top alum. cap
#3	10092.36	10417.31	3685.97	Top alum. cap
#4	9966.67	10489.53	3685.70	Top alum. cap
#5	9865.67	10437.08	3686.44	Top alum. cap
#6	9807.86	10293.15	3686.28	Top alum. cap
#7	10013.34	10283.62	3686.94	Top alum. cap
#8	9989.95	10130.35	3685.69	Top alum. cap
#9	9862.83	10149.33	3685.61	Top alum. cap
#10	10006.02	9997.82	3678.02	Top alum. cap
#11	9964.22	10309.03	3684.57	Top alum. cap

Activity	2004 Budget	Revised Budget May 2004	Committed Cost this Period	Cumulative Committed Cost To Date 8-31-08	Forecasted Cost To Complete	Forecasted Final Cost	Remarks on Forecast to Complete
<b>Phases I through III (Completed February 2006)</b>							
Phase I - Drain Excess Liquid From Tailings	189,200	72,700		67,928	0	67,928	
Phases II, IIA + IIB - Evaporate Excess Liquid	6,000	8,000		242,882	0	242,882	
Phase III - Regrading & Final Cover System	337,000	342,050		504,742	0	504,742	
Field Indirect Costs	164,500	213,568		378,517	0	378,517	Includes Jan + Feb 2006 long term monitoring costs
Heda Costs	18,700	18,700	0	33,324	0	33,324	
<b>Subtotal Phases I through III</b>	<b>715,400</b>	<b>655,018</b>	<b>0</b>	<b>1,227,393</b>	<b>0</b>	<b>1,227,393</b>	
<b>Long Term Monitoring (through FY 2010)</b>							
Site Inspections			177	182,658	1,420	184,078	
Settlement Monitoring			675	6,075	4,350	10,425	
<b>Consultant Support:</b>							
Annual Geotechnical Engineer Inspections			0	2,495	18,100	20,595	Includes settlement monitoring data analysis
Vegetation Monitoring			0	0	20,000	20,000	Allowance for surveys in FY 2008 - 2010
Site Conditions Review - MEI				6,474	3,327	9,801	
Site Conditions Review - SVL Analytical			0	2,079		2,079	
Erosion Repair Review - MEI				2,927	573	3,500	
Revegetation Review - Bamberg					3,500	3,500	
<b>Maintenance:</b>							
Erosion Repair Allowance				21,941	7,500	29,441	Erosion repair conducted April 2008
Revegetation Allowance				9,912	10,000	19,912	Revegetation conducted April 2008
<b>Heda Project Management Costs:</b>							
Labor			0	2,266	7,909	10,175	
Travel expenses			0	0	1,312	1,312	
<b>Subtotal Long Term Monitoring</b>	<b>0</b>	<b>0</b>	<b>852</b>	<b>236,827</b>	<b>77,991</b>	<b>314,818</b>	
<b>Total Pond 2 Final Closure</b>	<b>715,400</b>	<b>655,018</b>	<b>852</b>	<b>1,464,220</b>	<b>77,991</b>	<b>1,542,211</b>	

**Fw: Apex - August 2008 report**  
**Eric Johnson to: Amy Swanson**

09/23/2008 06:51 AM

—— Forwarded by Eric Johnson/ENF/R8/USEPA/US on 09/23/2008 06:51 AM ——



**Paul Glader**  
<pglader@hecla-mining.com  
>

09/22/2008 04:34 PM

To Eric Johnson/ENF/R8/USEPA/US@EPA  
cc

Subject Apex - August 2008 report



Apex.Pond 2 - progress rpt complete, august 2008.pdf